

<u>SUBJECT</u>		<u>DATE</u>
1056. Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
1057. Decharacterized RCRA Waste - Manifesting and LDR Reporting	ENCORE	APR 30, 2015
1058. Decharacterized Hazardous Waste Listed Solely for Non-Toxic Characteristics	ENCORE	MAY 7, 2015
1059. Decharacterized Wastes, <90-Day Accumulation Time Limits and LDR Storage Prohibition	ENCORE	MAY 14, 2015
1060. Decharacterized Wastes and the LDR Dilution Prohibition	ENCORE	MAY 21, 2015
1061. Hazardous Debris Macroencapsulation and Size Reduction	ENCORE	MAY 28, 2015
1062. Universal Waste Lamps and Prohibition on Crushing		JUN 4, 2015
1063. F003 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 11, 2015
1064. F001 - F005 Listed Hazardous Waste and the 10% Rule	ENCORE	JUN 18, 2015
1065. Macroencapsulation of Hazardous Debris and Presence of Free Liquids	ENCORE	JUN 25, 2015
1066. DOT Shipping of Damaged, Defective or Recalled Lithium Batteries		JUL 1, 2015
1067. Used Oil Eligibility for Animal and Vegetable Oils	ENCORE	JUL 9, 2015
1068. Used Oil Eligibility for Petroleum Oils Mixed with Animal or Vegetable Oils		JUL 16, 2015
1069. Conditioned Exclusion for Listed Hazardous Waste Debris Treated via Extraction/Destruction	ENCORE	JUL 23, 2015
1070. Conditioned Exclusion for Characteristic Debris Treated via Immobilization		JUL 30, 2015
1071. RCRA Personnel Training and Classroom Training vs. Online Training		AUG 6, 2015
1072. PCB Decontamination Standards with No Decontamination Performed		AUG 13, 2015
1073. PCB Manifest Exceptions a.k.a. When is a PCB Manifest Not Required	ENCORE	AUG 19, 2015
1074. PCB Manifest Relief a.k.a. When is a PCB Manifest Not Required – The Sequel		AUG 27, 2015
1075. Hazardous Debris and Radioactively Contaminated Cadmium Batteries	ENCORE	SEP 3, 2015
1076. Hazardous Debris and Radioactively Contaminated Lead Acid Batteries	ENCORE	SEP 10, 2015
1077. Mercury Wet Cell Batteries - Debris or Not Debris	ENCORE	SEP 17, 2015
1078. Hazardous Debris and Non-Radioactive Lead Acid Batteries		SEP 24, 2015
1079. Unused Paraformaldehyde - U Listed Hazardous Waste or Not?	ENCORE	OCT 1, 2015
1080. CAS Numbers and the Hazardous Waste "U" and "P" Listings	ENCORE	OCT 8, 2015
1081. Universal Waste One Year Accumulation and Multiple Handlers	ENCORE	OCT 15, 2015
1082. LDR Notifications and F001-F005 Constituents of Concern	ENCORE	OCT 29, 2015
1083. LDR Notifications and F001-F005 Constituents of Concern – Again	ENCORE	NOV 5, 2015
1084. LDR Notifications and F001-F005 Constituents of Concern - One Last Time	ENCORE	NOV 12, 2015
1085. DOT and Terminal Protection of Alkaline Batteries	ENCORE	NOV 19, 2015
1086. Used Oil and Keeping Containers Closed – WAC 173-303 vs. 40 CFR 279		NOV 24, 2015
1087. PCB Weight Determinations	ENCORE	DEC 3, 2015
1088. Satellite Accumulation Requirements and Container Inspections	ENCORE	DEC 10, 2015
1089. 'Twas The Night Before Christmas - The Twenty-Third Annual Edition	ENCORE	DEC 24, 2015
1090. Satellite Accumulation and 85-Gallon Containers	ENCORE	DEC 31, 2015
1091. PCB Date Removed From Service Notations – On the Item or In a Log	ENCORE	JAN 7, 2016
1092. The Date Removed From Service Mark on the PCB Marking	ENCORE	JAN 14, 2016

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## TWO MINUTE TRAINING

**TO:** CH2M HILL PLATEAU REMEDIATION COMPANY

**FROM:** PAUL W. MARTIN, RCRA Subject Matter Expert  
CHPRC Environmental Protection, Hanford, WA

**SUBJECT:** THE DATE REMOVED FROM SERVICE MARK ON THE PCB MARKING

**DATE:** JANUARY 14, 2016

<u>CHPRC Projects</u>	<u>CH PRC - Env. Protection</u>	<u>MSA</u>	<u>Hanford Laboratories</u>	<u>Other Hanford Contractors</u>	<u>Other Hanford Contractors</u>
Richard Austin Roni Ashley Tania Bates Bob Cathel Rene Catlow Richard Clinton Larry Cole John Dent Brian Dixon Eric Erpenbeck Stuart Hildreth Mike Jennings Stephanie Johansen Jeanne Kisielnicki Melvin Lakes Jim McGrogan Stuart Mortensen Anthony Nagel Dean Nester Dave Richards Phil Sheely Connie Simiele Jennie Stults Michael Waters Jeff Widney	Brett Barnes Mitch Boyd Ron Brunke Bill Cox Laura Cusack Lorna Dittmer Rick Engelmann Ted Hopkins Sasa Kosjerina Jim Leary Dale McKenney Jon McKibben Rick Oldham Linda Petersen Fred Ruck Ray Swenson Wayne Toebe Lee Tuott Daniel Turlington Dave Watson Joel Williams	Jerry Cammann Jeff Ehlis Garin Erickson Lori Fritz Panfilo Gonzales Jr. Dashia Huff Mark Kamberg Edwin Lamm Candice Marple Saul Martinez Jon Perry Thomas Pysto Christina Robison Don Rokkan Lana Strickling Lou Upton	(TBD)  <u>DOE RL, ORP, WIPP</u>  Mary Beth Burandt Duane Carter Cliff Clark Mike Collins Tony McKarns Ellen Mattlin Greg Sinton Scott Stubblebine	Bill Bachmann Dean Baker Scott Baker Lucinda Borneman Paul Crane Tina Crane Greta Davis Jeff DeLine Ron Del Mar John Dorian Mark Ellefson Darrin Faulk Joe Fritts Tom Gilmore Rob Gregory Gene Grohs James Hamilton Andy Hobbs Ryan Johnson Dan Kimball Megan Lerchen Richard Lipinski Charles (Mike) Lowery Michael Madison Terri Mars Cary Martin Grant McCalmant Steve Metzger Tony Miskho Matt Mills Tom Moon Chuck Mulkey Mandy Pascual Kirk Peterson Jean Quigley	Dan Saueressig Merrie Schilperoort Joelle Moss Glen Triner Greg Varljen Julie Waddoups Jay Warwick Kyle Webster Jeff Westcott Ted Wooley

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## TWO MINUTE TRAINING

**SUBJECT:** The Date Removed From Service Mark on the PCB Marking

**Q:** A customer with DOT experience is reluctant to handwrite the PCB Date Removed from Service (DRS) mark directly on the yellow PCB marking. The DOT hazard class labels cannot be altered in any way or the labels are considered obliterated. This DOT knowledge has created the reluctance in the customer to handwrite the DRS on the PCB mark since the additional wording might invalidate the PCB mark. Should the customer be concerned?

**A:** We should always be concerned.

40 CFR 761.45, "Marking formats" does contain prescriptive language stating that the PCB mark shall be as shown in Figure 1 for the large mark or Figure 2 for the small mark. The size and color of the PCB mark are also stipulated. DOT on the other hand has very prescriptive language to the point that DOT does not allow the label manufacturer's name on the label unless it is "printed outside the solid line inner border in no larger than 10-point type". DOT also has prescriptive language for size, color and wording.

Further research of the regulations at 40 CFR 761, and assorted TSCA PCB Federal Registers did not reveal any clarifications of whether or not the DRS could be handwritten on the yellow PCB mark. Therefore a telephone call was made to the TSCA Hotline (202-554-1404) and the following question asked:

"Is it OK to handwrite the DRS somewhere on the PCB mark as long as it does not interfere with the prescribed wording?"

The Hotline referred the question to Mr. Winston Lue at TSCA EPA Headquarters (HQ) and after one clarifying telephone call and a few additional e-mails, Mr. Winston and Mr. Tom Simons, also of TSCA EPA HQ concurred that it was not an issue to handwrite the DRS on the PCB mark as long as the other PCB marking wording was not overwritten.

Whew!

### SUMMARY:

- The TSCA PCB mark has prescriptive language concerning the format, size and color of the mark
- Unlike DOT's very prescriptive label specifications, the PCB mark can include additional handwritten information such as the date removed from service.
- EPA concurred that handwriting the date removed from service on the PCB mark was not an issue.

The EPA HQ e-mail clarifications and 40 CFR 761.45 are attached to the e-mail. If you have any questions, please contact me at "Paul\_W\_Martin@rl.gov" or at (509) 376-6620.

**FROM:** Paul W. Martin

**DATE:** 01/14/16

**FILE:** c:\...\2MT\2016\011416.rtf

**PG:** 1

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** The Date Removed From Service Mark on the PCB Marking

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From: Martin, Paul W - CHPRC  
Sent: Wednesday, March 04, 2009 9:50 AM  
To: 'lue.winston@epa.gov'  
Subject: PCB Mark and Date Removed From Service

Winston,

Just to confirm our telephone conversation this morning, I had asked you if it was acceptable to handwrite the date removed from service (DRS) somewhere on the yellow PCB marking that would not obscure the required PCB marking information. We've had some internal concerns raised that by adding this handwritten information to the 40 CFR 761.45 prescribed PCB Marking format, we might somehow invalidate the PCB Marking. My position has been that adding the DRS on the PCB Mark is an efficient compliance mechanism for ensuring that the PCB waste container has all required markings since all markings will be in one location on the PCB item. Your response was that handwriting the DRS on the PCB marking was acceptable assuming the DRS wording is legible and written in indelible ink like with a "Sharpie" pen.

If you concur with my summary of our telephone conversation an affirmative reply via e-mail would be appreciated.

Thanks!

Paul W. Martin  
Environmental Compliance Officer  
T Plant Complex, Hanford Site  
Department of Energy, Richland, WA  
Phone (509) 376-6620 / Cell 531-4489 / Fax 373-1539

=====

From: Lue.Winston@epamail.epa.gov [mailto:Lue.Winston@epamail.epa.gov]  
Sent: Tuesday, March 17, 2009 6:21 AM  
To: Martin, Paul W - CHPRC  
Cc: Finn.Molly@epamail.epa.gov; Hensley.Amy@epamail.epa.gov  
Subject: Re: FW: PCB Mark and Date Removed From Service

I concur with the email. It is okay to put a mark on the ML label as long as you are doing it to mark electrical equipment out of service.

Winston M. Lue  
Chemical Engineer  
Permits Branch  
Program Implementation and information Division, W Office of Resource Conservation  
Mail Code: 5303P U.S. EPA  
Phone - 703 305-1617 Fax - 703-308-8638

=====

**FROM:** Paul W. Martin

**DATE:** 01/14/16

**FILE:** c:\...\2MT\2016\011416.rtf

**PG:** 2

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** The Date Removed From Service Mark on the PCB Marking

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From: "Martin, Paul W - CHPRC" <Paul\_W\_Martin@RL.gov>  
To: Winston Lue/DC/USEPA/US@EPA  
Cc: Molly Finn/DC/USEPA/US@EPA, Amy Hensley/DC/USEPA/US@EPA  
Date: 03/17/2009 12:15 PM  
Subject: RE: FW: PCB Mark and Date Removed From Service

You're reply only referenced electrical equipment. Did you intend to make a limitation? I assume it is OK to put the date removed from service (DRS) on a PCB mark that is required on any PCB item, specifically PCB waste containers.

Note that the DRS mark will not obscure any wording on the PCB mark.

Thanks for helping with this clarification.

Paul W. Martin  
Environmental Compliance Officer  
T Plant Complex  
Phone (509) 376-6620 / Cell 531-4489 / Fax 373-1539

=====

From: Winston Lue/DC/USEPA/US  
To: Martin, Paul W - CHPRC" <Paul\_W\_Martin@RL.gov>  
Cc: Molly Finn/DC/USEPA/US@EPA, Amy Hensley/DC/USEPA/US@EPA, Tom Simons/DC/USEPA/US@EPA, Jeff Gaines/DC/USEPA/US@EPA  
Date: 03/19/2009 07:10 AM  
Subject: RE: FW: PCB Mark and Date Removed From Service

This would apply to all PCB Items, Articles, Containers, etc...

Winston M. Lue  
Chemical Engineer  
Permits Branch  
Program Implementation and information Division, W Office of Resource Conservation  
Mail Code: 5303P U.S. EPA Phone - 703 305-1617 Fax - 703-308-8638

=====

From: Simons.Tom@epamail.epa.gov [mailto:Simons.Tom@epamail.epa.gov]  
Sent: Thursday, March 19, 2009 4:40 AM  
To: Lue.Winston@epamail.epa.gov  
Cc: Hensley.Amy@epamail.epa.gov; gaines.jeff@epamail.epa.gov; Finn.Molly@epamail.epa.gov; Martin, Paul W - CHPRC  
Subject: RE: FW: PCB Mark and Date Removed from Service

Anything that has a 1-year deadline for disposal.

Tom Simons  
Fibers and Organics Branch  
National Program Chemicals Division  
Office of Pollution Prevention and Toxics Room 4353RR (EPA East Entrance)  
Phone - 202-566-0517 Fax - 202-566-0473 Mail Code - 7404T

**FROM:** Paul W. Martin

**DATE:** 01/14/16

**FILE:** c:\...\2MT\2016\011416.rtf

**PG:** 3

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## TWO MINUTE TRAINING - ATTACHMENT

**SUBJECT:** The Date Removed From Service Mark on the PCB Marking

### §40 CFR 761.45 Marking formats

The following formats shall be used for marking:

(a) *Large PCB Mark-M<sub>L</sub>*. Mark M<sub>L</sub> shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

(b) *Small PCB Mark-M<sub>s</sub>*. Mark M<sub>s</sub> shall be as shown in Figure 2, letters and striping on a white or yellow background, and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the PCB Article, PCB Equipment, or PCB Container. The mark shall be a rectangle 2.5 by 5 cm (1 inch by 2 inches). If the PCB Article or PCB Equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 1 by 2 cm (.4 by .8 inches).



Figure 1



Figure 2

[44 FR 31542, May 31, 1979. Redesignated at 47 FR 19527, May 6, 1982]